

## **EXHIBIT 1**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

MDL No. 2419  
Master Dkt. 1:13-md-02419-RWZ

THIS DOCUMENT RELATES TO:

All Actions Naming St. Thomas Outpatient  
Neurosurgical Center

**DEPOSITION NOTICE**

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure and MDL Order No. 10 (Document #1426), the Plaintiffs' Steering Committee ("PSC") will take the deposition of Michael D. O'Neal on Tuesday, January 11, 2016 at 9:00 a.m. at the offices of Gideon, Cooper & Essary, PLC, 315 Deaderick Street, Suite 1100, Nashville, TN 37238. The deposition will be recorded by stenographical means and by video.

Dated: December 31, 2015

Respectfully submitted,

**/s/ Benjamin A. Gastel**

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*Plaintiffs' Steering Committee and Tennessee State  
Chair*

**CERTIFICATE OF SERVICE**

I, Benjamin A. Gastel, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system. Further I have served copy of the foregoing upon counsel for the witness via e-mail and U.S. Mail, postage prepaid as follows:

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**/s/ Benjamin A. Gastel**  
Benjamin A. Gastel